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November 30, 1998

BY EXPRESS MAIL

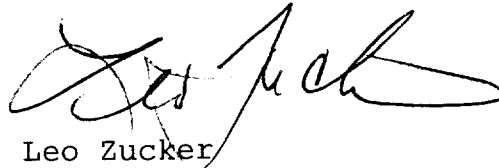
Magalie Roman Salas
Office of the Secretary, Room 222
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Re: WT Docket No. 98-143
Comments of Leo Zucker, K2LZ

Dear Ms. Salas:

Enclosed are an original and ten copies of the above comments. Kindly file the comments, and acknowledge receipt by stamping and returning the attached self-addressed postcard.

Very truly yours,



Leo Zucker

encs.

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

1998 Biennial Regulatory Review --)
Amendment of Part 97 of the Commission's)
Amateur Service Rules)
) WT Docket No. 98-143
) RM-9148
) RM-9150
) RM-9196
)

TO: The Commission

COMMENTS OF LEO ZUCKER, K2LZ

Leo Zucker respectfully submits the following comments in the above-captioned proceeding and in response to the Notice of Proposed Rule Making released August 10, 1998 ("the NPRM").

I. Interest of Leo Zucker in This Proceeding

1. I was first licensed as a Novice Amateur Radio Service Operator in November 1957 with station call letters KN2HGR. In May 1958 I upgraded to General Class, and in 1965 I obtained an Amateur Extra Class Operator License (No. AE-2-488). In 1977 I applied to the Commission for "preferred" 1x2 call letters and my present call sign - K2LZ - issued under the rules then in effect.

2. I became interested in the Amateur Radio Service at the age of 13, as a way to enjoy communicating with others locally or world-wide, and to develop my skills in the electronics and radio arts. My ambition at the time was to follow an engineering career, and the Amateur Service afforded me "hands-on" equipment building and operating experience that proved invaluable for working in the commercial and military electronics sectors. Today, I find that as a practicing attorney, I can effectively represent clients involved with communications technology in various legal matters. I therefore believe that any rules to be adopted through this proceeding must act to preserve the basis and purpose of the Amateur Service, namely, to expand the existing reservoir of trained operators, technicians and electronics experts, and to enable such persons to contribute to the communications art.

II. Number of License Classes & Telegraphy Requirements

3. I respectfully disagree with the proposal to eliminate the Novice class operator license. I believe that an "entry class" license should remain available to those persons who may not have had an opportunity to acquire both the technical knowledge and the Morse Code proficiency needed to pass higher grade license examinations. These skills can be learned best

only by routine practice in sending and receiving Morse Code on the Novice bands, having face-to-face discussions on technical matters with fellow operators and teachers, and studying the relevant literature.

4. I also submit that a five word-per-minute (5 wpm) code test is not too much to expect from an individual if he/she has a sincere desire to use Amateur Service privileges as a vehicle for contributing to the communications art. Morse code is the most basic form of wireless communication and requires nothing more for its transmission than a radio frequency oscillator, a key-switch, and an antenna. For a given transmit power, Morse code can convey intelligible information through noise and interference where voice and more complex modes can not. Under emergency conditions when only limited power is available, Morse code may be the only viable means of communication. And, for persons inclined to experiment and build their own equipment (a skill to be encouraged as wireless technology and the need for trained persons grow), a simple code transmitter can be a worthwhile project.

5. As new communication modes emerge, however, Amateur Service operators should be able to demonstrate their knowledge of such modes to obtain more than Novice class privileges. See NPRM ¶ 24. Although I believe the present 13 and 20 wpm Morse

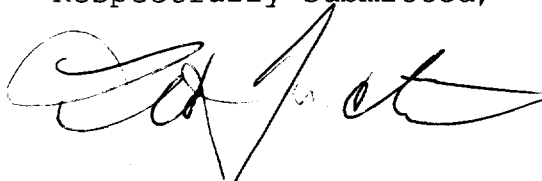
code requirements for the General/Advanced and Extra Class licenses are appropriate considering the increased code spectrum allowed those classes on the HF bands, I believe consideration should be given to allow an applicant certain options in the examination procedure. For example, instead of demonstrating 13 wpm Morse code proficiency for a General Class license, an applicant may elect instead to take a 5 wpm code examination. If he/she passes, the applicant would then be required to tune up a transceiver provided by the Examiner, and communicate with another station over-the-air in a radio teletype mode under the Examiner's supervision. Reasonable standards may be used by the Examiner, or established by the Commission, to determine what constitutes "passing" this phase of the examination.

6. More complex over-the-air operating tasks may be required for higher grade applicants, if they pass only a 5 wpm Morse code test. For example, such an Advanced Class applicant may be required to connect a slow-scan video camera to a HF transceiver and communicate with another station using the same mode. An Extra Class applicant may be required to demonstrate his/her wireless communication ability using a spread-spectrum voice mode, or the like.

III. Conclusion

7. Due consideration by the Commission of all matters raised herein is respectfully requested.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Leo Zucker', with a large, sweeping flourish extending to the right.

Leo Zucker

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